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16 Counsel for Robins Cloud LLP

11 UNITED STATES BANKRUPTCY COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 In re ) Case No. 19-30088 (DM)  
15 PG&E CORPORATION, )  
16 ) Chapter 11  
17 and )  
18 PACIFIC GAS AND ELECTRIC ) (Lead Case–Jointly Administered)  
19 COMPANY )  
20 Debtors ) **DECLARATION OF ROBERT**  
21 ) **BRYSON IN SUPPORT OF MOTION**  
22 ) **FOR ORDER AUTHORIZING**  
23 ) **WITHDRAWAL OF COUNSEL TO**  
24 ) **G. D., A MINOR CHILD**

25 Affects:

- 26 ☐ PG&E Corporation )  
27 ☐ Pacific Gas & Electric Company )  
28 ☒ Both Debtors )

\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

1 **Declaration of Robert Bryson**

2 I, Robert Bryson, say and declare as follows:

3 1. I am an individual over 18 years of age and competent to make this declaration.

4 2. I am an attorney with the law firm of Robins Cloud LP (the "Firm"), attorneys of  
5 record for G. D., a minor child, ("Creditor").<sup>1</sup> I am duly admitted to practice law before all courts  
6 of the State of California and before this court.

7 3. I make this declaration in support of the Firm's motion to be relieved as counsel  
8 to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true  
9 and within the scope of my personal knowledge, and if called upon to do so I could and would  
10 testify competently to these facts.

11 4. On January 29, 2019, Debtors filed voluntary petitions commencing their  
12 bankruptcy cases.

13 5. On October 16, 2019, the Firm filed Proof of Claim No. 30573 on behalf of G. D.,  
14 a minor child, ("Claim"), seeking damages from the Camp Fire. Since the filing of the Claim, an  
15 irreconcilable difference has developed between Creditor and the Firm. As a result, the Firm  
16 notified Creditor that it must withdraw as counsel.

17 6. To the extent that Creditor requests that the Firm turn over any files or  
18 information that she is entitled to, the Firm will cooperate and transmit such files.

19 7. The Firm will cause the Motion to be served on all of the addresses provided to  
20 the Firm by Creditor, including the following:

21 G.D., a minor Child  
22 c/o Rebecca Johnson  
12370 SE Ash St. Apt. 121  
Portland, OR 97233

G.D., a minor Child  
c/o Rebecca Johnson  
3838 Windermere Ln  
Oroville, CA 95965

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on January 13, 2022.

25   
26 Robert Bryson

27  
28 <sup>1</sup> The Firm retained Grimshaw Law Group, P.C. ("GLG") to, among other things, assist it in filing this motion. GLG has no contractual or attorney/client relationship with Creditor.